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EXECUTIVE SECRETARY

October 10, 2001

VIA HAND DELIVERY

Mr. K. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

*Re: Joint Petition of Crockett Telephone Company, Inc., Peoples' Telephone Company, West Tennessee Telephone Company, Inc., and the Consumer Advocate Division of the Office of the Attorney General for the Approval and Implementation of Earnings Review Settlement.
Docket No. 99-00995*

Dear Mr. Waddell:

Enclosed please find the original and thirteen (13) copies of the Responses of Crockett Telephone Company, Inc., Peoples' Telephone Company, and West Tennessee Telephone Company, Inc. to AT&T Communications of the South Central States, Inc.'s Revised First Set of Discovery Requests for filing in the above-referenced docket. I have also enclosed an additional copy of the Responses, which I would appreciate your stamping "filed," and returning to me by way of our courier.

Should you have any questions with respect to this matter, please do not hesitate to contact me.

Best regards.

Very truly yours,



R. Dale Grimes

RDG/gci
Enclosures

cc: Jack W. Robinson, Jr., Esq. (via hand delivery, w/ enclosure)
Timothy C. Phillips, Esq. (via hand delivery, w/ enclosure)
J. Richard Collier, Esq. (via hand delivery, w/ enclosure)
T.G. Pappas, Esq. (w/ enclosure)
Mr. Gregory Eubanks (w/ enclosure)
Mr. Thomas W. Ott (w/ enclosure)
Mr. Dwight S. Work (w/ enclosure)

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:)	
)	
JOINT PETITION OF CROCKETT)	
TELEPHONE COMPANY, INC., PEOPLES')	
TELEPHONE COMPANY, WEST)	
TENNESSEE TELEPHONE COMPANY, INC.,))	Docket No. 99-00995
AND THE CONSUMER ADVOCATE)	
DIVISION OF THE OFFICE OF THE)	
ATTORNEY GENERAL FOR THE)	
APPROVAL AND IMPLEMENTATION OF)	
EARNINGS REVIEW SETTLEMENT)	

**RESPONSES OF CROCKETT TELEPHONE COMPANY, INC., PEOPLES'
TELEPHONE COMPANY, AND WEST TENNESSEE TELEPHONE COMPANY, INC.
TO AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC.'S
REVISED FIRST SET OF DISCOVERY REQUESTS**

1. In the proposed settlement agreement between the TEC Companies and the CAD, it is proposed to give a monthly credit in 2000 and 2001 of "\$5.00 per business access line" and of "\$4.75 per residence access line."

a. Do the terms "business access line" and "residence access line" that are used in the settlement agreement refer to tariffed services that use the same terms?

Response:

Crockett Telephone Company, Inc.

Access - Residence
Access - Business

Peoples' Telephone Company, Inc.

Business - 1 party access line
Residence - 1 party access line

West Tennessee Telephone Company, Inc.

Business - 1 party access line
Residence - 1 party access line

b. For each TEC Company, identify the current tariff pages or section of the tariff that covers the services referred to in the settlement agreement as "business access line" and "residence access line."

Response:

Crockett Telephone Company, Inc.

Business - Crockett General Services Tariff, § IV, Local Exchange Service, page 1, effective 5-1-97.

Residence - Crockett General Services Tariff, § 3, Basic Local Exchange Service, page 2, Effective 5-1-97.

Peoples' Telephone Company, Inc.

Business - Peoples' General Services Tariff, § 3, Basic Local Exchange Service, page 2, effective 3/29/98.

Residence - Peoples General Services Tariff, § 3, Basic Local Exchange Service, page 2, Effective 3/29/98.

West Tennessee Telephone Company, Inc.

Business - West Tenn. General Services Tariff, § 3, Basic Local Exchange Service, page 2, effective 5-1-97.

Residence - West Tenn. General Services Tariff, § 3, Basic Local Exchange Service, page 2, Effective 5-1-97.

c. Withdrawn

d. Under the proposed settlement, are the current rates for "business access lines" and "residence access lines" assumed to remain unchanged through the life of the agreement?

Response: Yes.

e., f., & g. Have the rates for "business access lines" or "residence access lines" for any TEC Company increased since 1984? If the answer is affirmative for any company, please identify which company.

Response: No.

h. What were the total revenues received by each of the TEC Companies from "business access lines" and "residence access lines" services during 1997, 1998 and 1999?

Response:

Crockett Telephone Company, Inc.

<u>Business:</u>	1997:	\$193,355.30	<u>Residence:</u>	1997:	\$328,024.40
	1998:	\$198,577.50		1998:	\$320,291.66
	1999:	\$272,165.10		1999:	\$441,206.36

Peoples' Telephone Company, Inc.

<u>Business:</u>	1997:	\$ 75,375.52	<u>Residence:</u>	1997:	\$169,943.28
	1998:	\$ 79,560.20		1998:	\$167,133.90
	1999:	\$135,967.92		1999:	\$307,278.30

West Tennessee Telephone Company, Inc.

<u>Business:</u>	1997:	\$ 41,698.94	<u>Residence:</u>	1997:	\$141,439.92
	1998:	\$ 46,775.82		1998:	\$133,187.34
	1999:	\$104,340.14		1999:	\$268,324.76

Note: 1999 Local Revenues include two months of Local Service Credits, where 1997 and 1998 include full year credits.

i. What were the average monthly revenues received by each of the TEC Companies from "business access lines" and "residence access lines" services during 1997, 1998 and 1999?

Response: Item 1.(h) divided by 12.

j. What are the forecast total revenues to be received by each of the TEC Companies from "business access lines" and "residence access lines" services during 2000 and 2001?

Response:

The forecast of total Residential and Business Local Service Revenues included in the Joint Petition is as follows :

	<u>2000</u>	<u>2001</u>	<u>Total</u>
Crockett Telephone Company, Inc.:	\$ 901,483	\$ 990,587	\$1,892,070
Peoples' Telephone Company, Inc.:	\$ 783,779	\$ 893,031	\$1,676,810
West Tennessee Telephone Company, Inc.:	\$ <u>682,905</u>	\$ <u>780,618</u>	\$ <u>1,463,523</u>
Total TEC:	\$2,368,167	\$2,664,236	\$5,032,403

k. What are the forecast average monthly revenues to be received by each of the TEC Companies from "business access lines" and "residence access lines" services during 2000 and 2001

Response: Item 1.(j) divided by 12.

2. (a) What do the TEC Companies contend were the costs of providing "business access lines" service in 1999?

Response: The answer to the request concerning the costs of providing local residence, business service or access services is unknown. As stated in the Rebuttal Testimony of Dwight S. Work, the TEC Companies are "average schedule companies and therefore do not have cost studies related to the access charge elements" contested by AT&T. Nor do the TEC Companies have cost information for local service. Accordingly, any questions directed to such costs cannot be answered.

(b) What do each of the TEC Companies contend will be the cost, or an estimate of costs, of providing "business access lines" service in 2000 and 2001?

Response: See response to item 2 (a).

(c) What do each of the TEC Companies contend were the costs, or an estimate of costs, of providing "residence access lines" in 1999?

Response: See response to item 2 (a).

(d) What do each of the TEC Companies contend will be the cost, or an estimate of costs, of providing "residence access lines" service in 2000 and 2001?

Response: See response to item 2 (a).

(e) What method for computing costs do the TEC Companies contend should be followed in computing the costs with respect to the costs of providing "business access lines" and "residence access lines" services?

Response: See response to item 2 (a).

3. (a) If the revenues to be received by each of the TEC Companies in 2000 and 2001, including the proposed credits, for providing "business access lines" and "residence access lines" service are below the cost of providing such service, list all services which are identified by each of the TEC Companies as producing revenues above the cost of providing such service during 1999.

Response: See response to item 2 (a).

(b) For each service listed in (a) above, state the amount by which the 1999 revenues exceeded the 1999 costs.

Response: See response to item 2 (a).

(c) In forecasting revenues and costs for 2000 and 2001, are any changes in the list of services shown in response to (a) above anticipated? If so, identify such services.

Response: See response to item 2 (a).

4. Withdrawn.

5. Withdrawn.

6. Objection sustained.

7. Objection sustained.

8. (a) Withdrawn.

(b) Please identify the subsidiaries of Telephone Electronics Corporation that operate in Tennessee.

Response: In addition to petitioners, Communigroup of Jackson, Inc., Peoples CATV, Inc., Tecnet, Inc., and Vartec Telecom, Inc.

(c) Excluding the three (3) TEC Companies that are petitioners in this case, what services are offered by the TEC subsidiaries in Tennessee.

Response: Long distance services and cable television.

Respectfully submitted,



R. Dale Grimes (#6223)

T. G. Pappas (#2703)

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*Attorneys for Crockett Telephone Company,
Inc., Peoples' Telephone Company, and
West Tennessee Telephone Company, Inc.*

STATE OF TENNESSEE)
)
COUNTY OF DAVIDSON)

Dwight S. Work, first being duly sworn, deposes and says that he is authorized to respond to AT&T Communications of the South Central States, Inc.'s Revised First Set of Discovery Requests on behalf of Crockett Telephone Company, Inc., Peoples' Telephone Company, and West Tennessee Telephone Company, Inc., and that the responses are true to the best of his knowledge, information, and belief.

CROCKETT TELEPHONE COMPANY, INC.,
PEOPLES' TELEPHONE COMPANY, AND
WEST TENNESSEE TELEPHONE COMPANY,
INC.

By:

Dwight S. Work

Subscribed and sworn to before me this 10th day of October, 2001.

My Commission expires: October 25, 2003

Amanda Sullivan

Notary Public

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Responses of Crockett Telephone Company, Inc., Peoples' Telephone Company, and West Tennessee Telephone Company, Inc. to AT&T Communications of the South Central States, Inc.'s Revised First Set of Discovery Requests has been served upon the following, via the method(s) indicated, this the 10 day of October, 2001:

[☒] Hand
[☐] Mail
[☐] Federal Express

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R. J. Quinn